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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. F/K/A,  
BIOPTIX, INC., JOHN O'ROURKE,  
JEFFREY G. MCGONEGAL, BARRY  
HONIG, CATHERINE DEFRANCESCO,  
MICHAEL BEEGHLEY, JOHN STETSON,  
MARK GROUSSMAN, ANDREW  
KAPLAN, MIKE DAI, JASON LES and  
ERIC SO,

Defendants.

Civil Action No. 18-cv-2293 (FLW) (ZNQ)

***Document electronically filed***

**DECLARATION OF  
KEVIN G. WALSH, ESQ. IN SUPPORT  
OF APPLICATION FOR ADMISSION  
*PRO HAC VICE* OF  
PERRIE M. WEINER, ESQ. AND  
EDWARD D. TOTINO, ESQ.**

I, **KEVIN G. WALSH**, of full age, declare, under penalty of perjury, as follows:

1. I am a Director at Gibbons P.C., and I submit this Declaration to the Court in support of Defendant Mark Groussman ("Groussman")'s application for an Order granting Perrie M. Weiner, Esq. and Edward D. Totino, Esq. admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Declaration.

2. I am a member in good standing of the bars of the State of New Jersey, the State of New York, the District of Columbia, the United States District Court for the District of New

Jersey, the United States District Court for the Southern District of New York, and the United States District Court for the Eastern District of New York.

3. On or about November 4, 2019, my office spoke with counsel for Plaintiffs who consented to the admission *pro hac vice* of Perrie M. Weiner, Esq. and Edward D. Totino, Esq. in this matter.

4. If the Court grants Groussman's application for the admission *pro hac vice* of Perrie M. Weiner, Esq. and Edward D. Totino, Esq., I or another member of Gibbons P.C. who is a member in good standing of the bars of the State of New Jersey and the United States District Court for the District of New Jersey will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be present for all appearances before the Court unless previously excused from appearing by the Court, will be responsible for the conduct of this action and for the conduct of Perrie M. Weiner, Esq. and Edward D. Totino, Esq. and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

5. For the foregoing reasons and those set forth in the Declarations of Perrie M. Weiner, Esq. and Edward D. Totino, Esq. submitted herewith, it is respectfully requested that the Court execute and direct the entry of the attached Order admitting Perrie M. Weiner, Esq. and Edward D. Totino, Esq. *pro hac vice* for the purpose of representing Groussman in this litigation.

I declare under penalty of perjury that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: December 3, 2019

By: s/ Kevin G. Walsh  
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